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8 **BEFORE THE**
PHYSICAL THERAPY BOARD OF CALIFORNIA
9 **DEPARTMENT OF CONSUMER AFFAIRS**
10 **STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against:

Case No. ID 2004 64071

12 KRISTA ANNE CREED
2529 Hermosa Ave.
13 Montrose, California 91020

A C C U S A T I O N

14 Physical Therapist License No. AT 5193

15 Respondent.

16
17 Complainant alleges:

18 PARTIES

19 1. Steven K. Hartzell ("Complainant") brings this Accusation solely in his
20 official capacity as the Executive Officer of the Physical Therapy Board of California,
21 Department of Consumer Affairs.

22 2. On or about August 31, 1998, the Physical Therapy Board of California
23 issued physical therapist license number AT 5193 to Krista Anne Creed ("Respondent"). This
24 license was in full force and effect at all times relevant to the charges brought herein and will
25 expire on April 30, 2006, unless renewed.

26 JURISDICTION

27 3. This Accusation is brought before the Physical Therapy Board of
28 California ("Board"), under the authority of the following laws and regulations.

1 4. Business and Professions Code section 2609 states:

2 The board shall issue, suspend, and revoke licenses and approvals to practice
3 physical therapy as provided in this chapter [chapter 5.7, commencing with section 2600].

4 5. Section 2661.5, subdivision (a) of the Code states:

5 “In any order issued in resolution of a disciplinary proceeding before the board,
6 the board may request the administrative law judge to direct any licensee found guilty of
7 unprofessional conduct to pay to the board a sum not to exceed the actual and reasonable cost of
8 the investigation and prosecution of the case.”

9 6. Section 141 of the Code states:

10 (a) For any licensee holding a license issued by a board under the jurisdiction
11 of the department, a disciplinary action taken by another state, by an agency of the
12 federal government, or by another country for any act substantially related to the
13 practice regulated by the California license, may be a ground for disciplinary
14 action by the respective state licensing board. A certified copy of the record of the
15 disciplinary action taken against the licensee by another state, an agency of the
16 federal government, or another country shall be conclusive evidence of the events
17 related therein.

18 (b) Nothing in this section shall preclude the board from applying a specific
19 statutory provision in the licensing act administered by that board that provides
20 for discipline based upon a disciplinary action taken against the licensee by
21 another state, an agency of the federal government, or another country.

22 CAUSE FOR DISCIPLINE
23 (Discipline by Another State)
 [Code Section 141]

24 7. Respondent is subject to disciplinary action under section 141, of the
25 Code, in that on February 13, 2002, the Arizona State Board of Physical Therapy, disciplined
26 Respondent’s physical therapy license. The circumstances are as follows:

27 8. On or about February 13, 2002, the Arizona State Board of Physical
28 Therapy issued an “Order of Probation” of respondent’s physical therapy license for practicing as

1 a physical therapy assistant without any supervision by a physical therapist. This order was for a
2 3 month probationary period. The probation terminated on May 13, 2002.

3 PRAYER

4 WHEREFORE, Complainant requests that a hearing be held on the matters herein
5 alleged, and that following the hearing, the Physical Therapy Board of California issue a
6 decision:

7 1. Revoking or suspending Physical Therapist Assistant license number
8 AT 5193 issued to KRISTA ANNE CREED;

9 2. Ordering Krista Anne Creed to pay the Physical Therapy Board of
10 California the reasonable costs of the investigation and enforcement of this case, pursuant to
11 Business and Professions Code section 2661.5;

12 3. Taking such other and further action as deemed necessary and proper.

13 DATED: June 29, 2005

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15 Original Signed By:
16 STEVEN K. HARTZELL
17 Executive Officer
Physical Therapy Board of California
State of California

18 Complainant

18 Creed Accusation.wpd
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